

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Presentment Date and Time:

12:00 p.m. EST on February 15, 2024

Objection Deadline:

12:00 p.m. EST on February 12, 2024

In re:

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI,

Debtor.

) Chapter 11

) Case No. 23-12055

NOTICE OF PRESENTMENT

OF PROPOSED ORDER ON MOTION FOR ENTRY

OF ORDER CLARIFYING WHETHER THE AUTOMATIC STAY

APPLIES TO STAY DISCOVERY IN CONSOLIDATED LITIGATION

PLEASE TAKE NOTICE that upon the *Motion for Entry of Order Clarifying Whether the Automatic Stay Applies to Stay Discovery in Consolidated Litigation* [Docket No. 49] (the “Motion”) of Herring Networks, Inc. d/b/a One America News Network, Charles Herring, Robert Herring, Sr., and Chanel Rion (collectively, the “Herring Parties”), the *Limited Opposition of the Dominion Parties to The Herring Parties’ Notice of Presentment of Proposed Order Setting Status Conference on Motion for Entry of Order Regarding the Automatic Stay and Underlying Motion Regarding the Automatic Stay* [Docket No. 58] (the “Objection”) filed by US Dominion, Inc., Dominion Voting Systems, Inc. and Dominion Voting Systems Corporation (collectively, the “Dominion Parties”), and the *Stipulation Concerning the Scope of the Automatic Stay of 11 U.S.C. § 362(a) with Respect to Certain Non-Bankruptcy Litigation Matters* [Docket No. 102] (the “Stipulation”), attached hereto as **Exhibit A**, by and between the Herring Parties and the Dominion Parties resolving the Motion and the Objection, the undersigned will present the proposed order attached hereto as **Exhibit B** to the Honorable Sean H. Lane on February 15, 2024 at 12:00 noon EST.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed order must be made in writing and received in the Bankruptcy Judge's chambers and by the undersigned not later than 12:00 p.m. EST on February 12, 2024. The ECF docket number to which the filing relates shall be included in the upper right-hand corner of the caption of all objections. Unless objections are received by that time, the order may be signed.

Dated: February 7, 2024

By: /s/ Victoria Argeroplos

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Certificate of Service

I certify that on February 7, 2024, the foregoing was filed with the Clerk of the Court using the CM/ECF system, which will electronically mail notification of the filing to all counsel of record who are registered ECF users.

/s/ Victoria Argeroplos
Victoria Argeroplos